

**Fill in this information to identify the case:**

Debtor 1

Morgen R Hatton

Debtor 2

(Spouse, if filing)

United States Bankruptcy Court for the: Middle District ofPennsylvania

(State)

Case number 5:19-bk-02509-MJC

Form 4100R

**AMENDED Response to Notice of Final Cure Payment****10/15**

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

**Part 1: Mortgage Information**

**Name of Creditor:** The Bank of New York Mellon FKA The Bank Of New York, as  
Trustee for The Certificateholders of The CWALT, Inc.,  
Alternative Loan Trust 2007-HY8C Mortgage Pass-Through  
Certificates, Series 2007-HY8C

Court claim no. (if known):

4-2**Last 4 digits** of any number you use to identify the debtor's account: XXXXXX4791**Property address:**1072 Shady Ln

Number Street

Honesdale, PA 18431-1022

City State ZIP Code

**Part 2: Pre-petition Default Payments***Check one:*

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the pre-petition default on the creditor's claim
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the pre-petition default on the creditor's claim. Creditor asserts that the total pre-petition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

**Part 3: Post-petition Mortgage Payment***Check one:*

- ☐ Creditor states that the debtor(s) are current with all post-petition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next post-petition payment from the debtor(s) is due on: \_\_\_\_\_

MM/DD/YYYY

- ☒ Creditor states that the debtor(s) **are not current** on all post-petition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total post-petition payments due:

(a) \$ 8,152.14

b. Total fees, charges, expenses, escrow, and costs outstanding

+(b) \$ (226.08)c. **Total.** Add lines a and b(c) \$ 7,926.06

Creditor asserts that the debtor(s) are contractually  
Obligated for the post-petition payment(s) that first became

Due on:

08/01/2022**Post-petition payments are from 8/1/2022-1/1/2023 @\$1,358.69**

MM/DD/YYYY

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the pre-petition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all post-petition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

Check the appropriate box:

- ☐ I am the creditor
- ☒ I am the creditor's authorized agent

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

**X**/s/Ciro A Mestres

Signature

Date 01/20/2023

Print

Ciro A Mestres

First Name Middle Name Last Name

Title Authorized Agent for the Creditor

Company

McCalla Raymer Leibert Pierce, LLC

**If different from the notice address listed on the proof of claim to which this response applies:**

Address

1544 Old Alabama Road

Number Street

Roswell, GA 30076

City State Zip Code

Contact phone 678-281-6516Email Ciro.Mestres@mccalla.com

In Re: Morgen R Hatton

Bankruptcy Case No.: 5:19-bk-02509-MJC  
Chapter: 13  
Judge: Mark J Conway

CERTIFICATE OF SERVICE

I, Ciro A Mestres, of McCalla Raymer Leibert Pierce, LLC, 1544 Old Alabama Road, Roswell, GA 30076, certify:

That I am, and at all times hereinafter mentioned, was more than 18 years of age;

That on the date below, I caused to be served a copy of the within AMENDED Response to Notice of Final Cure Payment filed in this bankruptcy matter on the following parties at the addresses shown, by regular United States Mail, with proper postage affixed, unless another manner of service is expressly indicated:

Morgen R Hatton  
1072 Shady Lane  
Honesdale, PA 18431

Mark E. Moulton *(served via ECF Notification)*  
Moulton and Moulton PC  
693 State Route 739, Suite #1  
Lords Valley, PA 18428

Jack N Zaharopoulos (Trustee) *(served via ECF Notification)*  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

Asst. U.S. Trustee *(served via ECF Notification)*  
United States Trustee  
228 Walnut Street, Suite 1190  
Harrisburg, PA 17101

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on: 01/20/2023 By: /s/Ciro A Mestres  
(date) Ciro A Mestres,  
Authorized Agent for the Creditor

Due Date	P&I	Interest	Escrow	Total	Filed w/Courts

Loan Number	
Debtor	Hatton
BK filed date	6/9/2019
BK Case #	19-02509
Loan Acquired	
Post Next Due	8/1/2022
Suspense	\$ 226.08

[illegible]

\$	8,152.14	
\$	226.08	unapplied
<u>\$</u>	<u>7,926.06</u>	

**Payment Address:**

Shellpoint Mortgage Servicing  
PO Box 10826  
Greenville, SC 29603-0826

**Overnight Payment Address:**

Shellpoint Mortgage Servicing  
Attn Payment Processing  
55 Beattie Place Ste 500MS-501  
Greenville, SC 29601